

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on June 3, 2010 at 10:00 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Carol A. Doyle in her usual Courtroom No. 742 in the Dirksen Federal Building at 219 South Dearborn Street, Chicago, Illinois, or whomever may be sitting in her place and stead, and then and there present the **Trustee's Motion to Extend Deadline for Filing Fee Applications**, a copy of which is attached hereto and hereby served upon you.

Dated: May 28, 2010

Respectfully submitted,

FRANCES GECKER, not individually, but as Chapter 11 Trustee for the bankruptcy estate of AUTOMOTIVE PROFESSIONALS, INC.

By: /s/ Reed A. Heiligman  
One of her attorneys

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**In re:** ) **Chapter 11**  
 )  
**AUTOMOTIVE PROFESSIONALS,** )  
**INC.,** ) **Case No. 07 B 06720**  
 )  
**Debtor.** )  
 ) **Honorable Carol A. Doyle**  
 )

**TRUSTEE'S MOTION TO EXTEND  
DEADLINE FOR FILING FINAL FEE APPLICATIONS**

Frances Gecker (the “Trustee”), not individually, but as Chapter 11 trustee of the bankruptcy estate of Automotive Professionals, Inc. (“API” or the “Debtor”), by her attorneys, respectfully requests the entry of an order, pursuant to Fed.R.Bankr.P. 9006(b), extending the deadline for filing final fee applications. In support of this motion (the “Motion”), the Trustee states as follows:

1. On March 26, 2010, the Court entered the Order Approving First Amended Disclosure Statement And Confirming Joint Liquidation Plan Of Automotive Professionals, Inc., As Modified.

2. On March 26, 2010 the Court entered an Order Approving First Amended Disclosure Statement and Confirming Joint Liquidation Plan of Automotive Professionals, Inc. (the “Plan”) (Docket No. 1266).

3. On April 6, 2010, the Court entered the Order Approving Form and Manner of Notice of Plan Confirmation and Administrative Claims Bar Date (Docket No. 1273) (the “Order”). Pursuant to the Order, the Court set May 28, 2010 as the deadline for filing final fee applications, and June 28, 2010 as the deadline for filing objections to final fee applications.

4. Trustee and her court approved attorneys, Frank/Gecker LLP (“F/G”) and

Scandaglia & Ryan (“Scandaglia”), continue to render services on behalf of the estate. The Trustee and F/G are continuing to prosecute claim objections and resolve claims filed against the estate. Scandaglia is representing the Trustee in connection with claims under a Business and Management Indemnity Policy that Westchester Fire Insurance Co. issued to API’s parent, NServ Corp. Those claims are currently being litigated in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, as *Westchester Fire Insurance Co. v. NServ Corp.*, et al., Case No. 09 CH 15996. Accordingly, the Trustee (i) requests authorization to continue filing monthly interim fee applications, as needed, (ii) requests that the deadline for the Trustee, F/G and Scandaglia to file final fee applications be extended until the bankruptcy case is closed, and (iii) requests that creditors and other parties in interest be given 30 days from the date of each such application to file an objection to same.

5. In addition, the Trustee requests that Arnstein & Lehr LLP, counsel to the Official Committee of Unsecured Creditors of the Estate of Automotive Professionals, Inc., be permitted to file its final fee application on or before July 28, 2010, and creditors and other parties in interest be permitted to file objections to such application on or before August 27, 2010.

WHEREFORE, the Trustee respectfully requests that the Court enter an order:

1. Authorizing the Trustee and her counsel to continue filing monthly interim fee applications as needed;
2. extending the deadline for the Trustee, F/G and Scandaglia to file their final fee applications until the bankruptcy case is closed, and allowing creditors and other parties in interest 30 days after each such application to file objections to same;

3. granting leave to Arnstein & Lehr LLP to file its final fee application on or before July 28, 2010, and granting creditors and other parties in interest leave to file objections to such application on or before August 27, 2010; and

4. granting such other and further relief as the Court determines appropriate.

Dated: May 28, 2010

FRANCES GECKER, not individually, but as Chapter 11 Trustee of the bankruptcy estate of Automotive Professionals, Inc.

By: /s/ Reed A. Heiligman  
One of her attorneys

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**CERTIFICATE OF SERVICE**

I, Reed A. Heiligman, an attorney, hereby certify that on **May 28, 2010**, a true and correct copy of the foregoing **Trustee's Motion to Extend Deadline for Filing Fee Applications** was filed electronically. Notice of the filing will be sent to all parties who are currently on the attached Court's Electronic Mail Notice List by operation of the Court's Electronic Filing System.

By: /s/ Reed A. Heiligman

## Mailing Information for Case 07-06720

### Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive e-mail notices for this case.

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